V. ALTERNATIVES

The *CEQA Guidelines* require the analysis of a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the project's basic objectives and avoid or substantially lessen any of the significant effects of the project. The range of alternatives required in an EIR is governed by a "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice.[1] CEQA states that an EIR should not consider alternatives "whose effect cannot be ascertained and whose implementation is remote and speculative."

The proposed project has been described and analyzed in the previous chapters, with an emphasis on significant impacts resulting from the proposed North Main Street Development (NMSD) Project and recommended mitigation measures to avoid these impacts. The following discussion is intended to inform the public and decision-makers of the relative impacts of three alternatives to the proposed project. A discussion of the environmentally superior alternative is also provided.

The three alternatives to the proposed project discussed in this chapter include:

- The **No Project/No Build alternative**, which assumes no development beyond the structures and the continuation of existing conditions within the project site.
- The **Reduced Build alternative**, which assumes a reduction in the size of most of the NMSD Project components.
- The **Senior-Center alternative,** which assumes that the Milpitas Grammar School would remain a senior center.

A No Project/No Build alternative that considered buildout under the existing zoning and General Plan was not specifically considered as the proposed NMSD Project is generally consistent with the existing zoning and General Plan. A discussion of each alternative, and an analysis of the anticipated environmental impacts of each alternative, is provided below. The emphasis of the analysis is on comparison of the anticipated impacts of each alternative to the impacts associated with the proposed project; the discussion includes a determination as to whether or not each alternative would reduce, eliminate, or create new significant impacts.

A. NO PROJECT/NO BUILD ALTERNATIVE

1. Principal Characteristics

The No Project/No Build alternative assumes that the project site would not be subject to development, and would generally remain in its existing condition. All existing structures would remain on the project site, and the existing land uses would stay the same. The DeVries Home and

[1] *CEQA Guidelines*, Section 15126.6.

the Milpitas Grammar School building would remain vacant, the two parcels west of North Main Street would not be developed, and the businesses on Winsor Avenue would remain.

2. Relationship to Project Objectives

The No Project/No Build alternative would not achieve the key objectives of the proposed project. It would not achieve the following objectives:

- Develop underutilized parcels within the project site to provide additional services for residents of Milpitas and Santa Clara County.
- Improve local circulation and encourage pedestrian activity.
- Further implementation of the Midtown Specific Plan and General Plan.
- Aggregation of uses to provide a concentration of land use that would serve as a catalyst for further development in the area.
- Develop updated library space to serve library patrons.
- Provide 60,000 square feet of library floor space.
- Provide affordable housing opportunities for seniors within the City of Milpitas.
- Provide convenient access to health facilities.
- Provide retail and meeting space opportunities within the project site.
- Provide energy generator/backup power to project facilities.

3. Analysis of the No Project/No Build Alternative

The potential impacts of the No Project/No Build alternative are described below.

a. Land Use and Planning. Similar to the proposed project, this alternative would not result in any significant land use impacts. Implementation of the No Project/No Build alternative would result in the continuation of existing land uses within the project site. No barriers exist that would divide an existing community, no new land uses would be introduced, and no existing land uses would conflict with the surrounding uses. The No Project/No Build alternative would not result in any significant land use impacts. However, it would not help achieve the goals of the Midtown Specific Plan generally, or the project specifically.

a. Population and Housing. Because the No Project/No Build alternative would not result in additional development, it would not induce population growth. This alternative would not displace the three existing vacant housing units, and the one occupied housing unit, within the project site. This alternative would not further the implementation of the Specific Plan policies, which seek to promote higher-density mixed-use development around Downtown and increase the City's supply of housing.

b. Transportation, Circulation and Parking. The No Project/No Build alternative would not change the existing traffic conditions, and as a result would avoid the project's traffic impacts. The one intersection of Main Street/Carlo Street would continue to operate at unacceptable levels under the PM condition, but the No Project/No Build alternative would not degrade any intersection's level

of service. None of the improvements proposed by the project would be built. The potential significant and unavoidable cumulative transportation impact that would occur with implementation of the proposed project would not occur under the No Project/No Build alternative.

c. Air Quality. Impacts to air quality would be less than those associated with implementation of the proposed project. The No Project/No Build alternative would not result in an increase to regional emissions or air quality impacts related to construction or demolition.

d. Noise. The No Project/No Build alternative would not result in the noise impacts associated with the proposed project. While uses that exist on-site under the No Project/No Build alternative would still be exposed to train related vibration and noise, there would be only one sensitive receptor (Dutra Home) within the project area. Additionally, the No Project/No Build alternative would not result in any construction-related noise impacts.

e. Hydrology and Water Quality. Similar to the proposed project, the No Project/No Build alternative would not result in a reduction of groundwater supplies or reduce the amount or quality of water available for public water supplies. Because the No Project/No Build alternative would not result in construction activities, the quality of stormwater runoff would not be potentially adversely affected. Additionally, this alternative would reduce the potential to exacerbate existing drainage and localized flooding that is associated with the proposed project.

f. Hazards. Implementation of the No Project/No Build alternative would keep the site in its existing conditions. As such, it would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, nor create a significant hazard to the public or the environment through reasonably foreseeable upset or accident conditions involving the release of hazardous materials into the environment. This alternative would not expose construction workers or the public to hazardous materials from contaminants in the soil during and following construction activities, or expose workers or the public to airborne toxics, (e.g., lead-based paint, asbestos, and mold) during the demolition of structures. Implementation of the No Project/No Build alternative would not hinder ongoing investigation and remediation of petroleum hydrocarbon and solvent contamination at the project site.

g. Cultural and Paleontological Resources. The No Project/No Build alternative would not result in any demolition or construction. As a result, there would be no disturbances of existing structures or of subsurface soils at the project site or in the project vicinity. The potential significant and unavoidable cultural resources impacts that would occur with implementation of the proposed project would not occur under the No Project/No Build alternative.

h. Aesthetic Resources. The No Project/No Build alternative would not result in any changes to the existing conditions on the project site. The No Project/No Build alternative would not change or effect scenic resources. It would also not result in the beneficial aesthetic impacts of the proposed project associated with an improved streetscape and more cohesive development. The impacts from light and glare that would occur with the proposed project would not occur with the No Project/No Build alternative.

B. REDUCED BUILD ALTERNATIVE

1. Principal Characteristics

The Reduced Build alternative would keep all the components of the NMSD Project, but would reduce the square footage of the senior housing and health facility and associated parking. The square footage of the Library project would remain the same. The square footage of the parking garage next to the library would be reduced by one-third to a two-story structure and 120,000 square feet. No retail would be located in the area proposed for the parking structure. The Winsor Blacksmith Shop and the Dutra Home would still be demolished.

The Senior Housing Complex would be built, but the size would be reduced by 25 percent, which would result in 75 units (one bedroom units) and one manager's unit to total 80,025 square feet in a three-story building. The DeVries Home would stay at its current location and not be rehabilitated. Parking would be provided at the 0.7 ratio, and 53 spaces would be provided on-site.

The County Health Facility square footage would be reduced by 20 percent, to result in a two-story, 48,000 square foot building. All uses proposed for the garage adjacent to Calaveras Boulevard would also be reduced by 20 percent, which would result in 10,000 square feet of retail space, 20,000 square feet of assembly space, and 73,200 square feet of parking to total 114,000 square feet. This would be a five-story structure, rather than six stories proposed by the project.

2. Relationship to Project Objectives

The Reduced Build alternative would not achieve the following project objective:

- Provide structure parking for up to 800 automobiles that can be used by multiple facilities in the adjacent area.

However, the scale of parking structures would be reduced to correspond with the reduction in square footage.

3. Analysis of the Reduced Build Alternative

The potential impacts of the Reduced Build alternative are described below.

a. Land Use and Planning. This alternative would not result in any significant land use impacts. Implementation of the Reduced Build alternative would result in the addition of new uses to the project site which would include the library, senior housing complex, health care center, parking structures, and retail and assembly space. Like the proposed project, no barriers would be constructed that would divide an existing community, and the new land uses would not conflict with the existing surrounding uses. The implementation of this alternative would also help to achieve the goals of the Midtown Specific Plan, such as bringing additional development to the Midtown area.

b. Population and Housing. The Reduced Build alternative would result in a direct population growth of approximately 150 residents. As with the proposed project, this growth would not be considered significant and would not be growth inducing because the project site is in an urbanized area, fully served by existing public utilities and planned for urban level development. Approximately two units would be displaced with Reduced Build alternative. However, approximately 76 units would be built as part of the Reduced Build Alternative.

c. Transportation, Circulation and Parking. The Reduced Build alternative would reduce the size of the proposed project and would reduce the number of vehicle trips associated with the proposed project. It is estimated that the Reduced Build alternative would generate 6,240 net new daily trips, 234 net new AM peak hour trips, 739 net new MD peak hour trips, and 735 net new PM peak hour trips. The Reduced Build alternative would reduce the number of net new daily trips by approximately 19 percent of the proposed project, which may reduce the significant project-level traffic impacts. Cumulative impacts would be expected to remain significant.

d. Air Quality. The Reduced Build alternative would have slightly reduced air quality impacts when compared with the proposed project. As is discussed above, the number of automobile trips that would be generated by this alternative would be approximately 19 percent less that those that would be generated by the proposed project, which would reduce the project's impact on regional emissions to a less-than-significant level.

As this alternative would involve new development, the air quality impacts related to demolition and construction under this alternative would be similar to the proposed project. This air quality impact could be reduced to a less-than-significant level with implementation of mitigation measures recommended for the proposed project.

e. Noise. Noise impacts that would result from implementation of the Reduced Build alternative would also be similar to the noise impacts that would result from the construction of the proposed project. These impacts would include construction related noise, train related noise, noise related to local traffic, and vibration and could be mitigated to a less-than-significant level with the mitigation measures recommended for the proposed project. As with the proposed project, under this alternative all noise impacts could be reduced to a less-than-significant level with implementation of the recommended mitigation measures.

f. Hydrology and Water Quality. The Reduced Build alternative would result in approximately the same amount of impervious surface as the proposed project, and would result in the same sort of hydrology impacts, which would include potential degradation of surface water quality and quality of stormwater runoff, and the potential to exacerbate existing drainage and localized flooding problems. As with the proposed project, under this alternative all hydrology and water impacts could be reduced to a less-than-significant level with implementation of the recommended mitigation measures.

g. Hazards. The Reduced Build alternative would result in approximately the same hazard impacts that would result from the proposed project, as many of the identified hazards are related to ground disturbance and construction. As with the proposed project, under this alternative all hydrology and water impacts could be reduced to a less-than-significant level with implementation of the recommended mitigation measures.

h. Cultural and Paleontological Resources. The Reduced Build alternative would result in the demolition of the Winsor Blacksmith Shop and the Dutra Home. The Milpitas Grammar School building would remain on-site and the DeVries Home would remain on-site in its current location. As with the proposed project, the outbuildings of the DeVries Home would be removed.

Compared to the proposed project, the Reduced Build alternative would minimize the project's significant cultural resources impacts. The construction of the senior housing element would change

the setting of the DeVries Home, but the home would be preserved in its current location and the level of impact would be reduced compared to the project. This impact could be considered less-than-significant. The Winsor Blacksmith Shop would be demolished under this alternative, resulting in a significant and unavoidable impact. Under the Reduced Build alternative, construction of the parking garage and library could have a significant and unavoidable impact, depending on the design of the structure.

i. Aesthetic Resources. The Reduced Build alternative would result in similar impacts to the proposed project alternative, but the amount of change would be incrementally less than the project. Similar to the proposed project, the visual character of the project site would change with the Reduced Build alternative, but it would not be degraded. Many of the structures would have a reduced height; the Eastern Parking Garage would be two stories, the county health facility would be two stories, and the parking structure adjacent to the health center would be five stories. Since the structures proposed with the Reduced Build alternative would not be as tall as the proposed project, the impact on scenic vistas would be reduced. The Calaveras Boulevard overpass would remain a prominent visual element of the project area. Implementation of the Reduced Build alternative would result in a significant impact related to a new source of light and glare, but this impact could be reduce with implementation of the mitigation measure outlined in Section IV.I, Aesthetic Resources.

C. SENIOR CENTER ALTERNATIVE

1. Principal Characteristics

The Senior Center alternative would allow the Milpitas Grammar School, which is currently vacant, to house the Milpitas Senior Center. The building would be slightly expanded by 1,500 square feet to accommodate a kitchen. Weller Lane and parts of Winsor Avenue would be abandoned to accommodate surface parking spaces. Under this alternative, no parking structure would be constructed adjacent to the Milpitas Grammar School building, and Winsor Blacksmith Shop and the Dutra Home would remain on-site. The senior housing complex, the county health facility, and the parking structure adjacent to Calaveras Boulevard would all remain the same as the proposed project.

2. Relationship to Project Objectives

The Senior Center alternative would not achieve the following project objectives:

- Develop and update library space to serve library patrons.
- Provide 60,000 square feet of library floor space.
- Provide structure parking for up to 800 automobiles that can be used by multiple facilities in the adjacent area.

3. Analysis of the Senior Center Alternative

The potential impacts of the Senior Center alternative are described below.

a. Land use and Planning. This alternative would not result in any significant land use impacts. Implementation of the Senior Center alternative would result in the addition of new uses to the project site which would include a senior center, a senior housing complex, a health care center, a parking structure, and retail and assembly space. Like the proposed project, no barriers would be constructed

that would divide an existing community, and the new land uses would not conflict with the existing surrounding uses. Additionally, the proposed project would help achieve the goals of the Midtown Specific Plan, such as bringing additional development to the Midtown area, but as noted above, would not achieve the project goal of providing new library space.

b. Population and Housing. The senior center alternative would not change the residential component of the proposed project. As such, the Senior Center alternative would result in a population growth of up to 220 residents (same as proposed project). This would be less than one percent of the current population of the City of Milpitas and is not considered significant. The site is an urbanized area with existing public services, so this alternative would not be growth inducing.

c. Transportation, Circulation and Parking. The Senior Center alternative would reduce the size of the proposed project and would reduce the number of trips associated with the proposed project. As the Library component is one of the main generators of vehicle trips associated with the project, it is estimated that this alternative would generate 3,815 net new daily trips, 215 net new AM peak hour trips, 379 net new MD peak hour trips, and 392 net new PM peak hour trips. The Senior Center alternative would reduce the number of net new daily trips by 50 percent of the proposed project, which would reduce the significant traffic impacts of the proposed project and some of the cumulative impacts.

d. Air Quality. The Senior Center alternative would have reduced air quality impacts when compared with the proposed project. As is discussed above, the number of automobile trips that would be generated by this alternative would be approximately 50 percent less that those that would be generated by the proposed project. This would reduce the regional emissions impact to a less-than-significant level.

As this alternative would involve new development, the air quality impacts related to demolition and construction would still occur. This air quality impact could be reduced to a less-than-significant level with implementation of mitigation measures recommended for the proposed project.

e. Noise. Noise impacts that would result from implementation of the Senior Center alternative would also be similar to the noise impacts that would result from the construction of the proposed project. These impacts would include construction related noise, train related noise, and noise related to local traffic and vibration, and could be mitigated to a less-than-significant level with the mitigation measures recommended for the proposed project. As with the proposed project, under this alternative all noise impacts could be reduced to a less-than-significant level with implementation of the recommended mitigation measures.

f. Hydrology and Water Quality. The Senior Center alternative would result in approximately the same amount of impervious surface as the proposed project, and would result in the same sort of hydrology impacts, which would include potential degradation of surface water quality and quality of stormwater runoff, and the potential to exacerbate existing drainage and localized flooding problems. The mitigation measures recommended for the project would also reduce the impacts of this alternative to a less-than-significant level.

g. Hazards. The Senior Center alternative would result in few hazards impacts than the proposed project. Since there would be minimal construction east of North Main Street, it is likely that

construction workers and the general public would not be exposed during construction to contaminants in the soil that have been identified east of North Main Street. Additionally, the Senior Center alternative would mostly likely not hinder ongoing investigation and remediation of petroleum hydrocarbon and solvent contamination. The remaining hazard impacts that would be associated with the proposed project would likely occur under the Senior Center alternative. All of these impacts could be reduced to a less-than-significant level through the implementation adoption of the mitigation measures recommended for the project.

h. Cultural and Paleontological Resources. The Senior Center alternative would reduce almost all of the impacts that would result from implementation of the proposed projects. Since the Milpitas Grammar School, Winsor Blacksmith Shop, and the Dutra Home would not be altered or demolished, there would be no cultural impacts associate with these structures. There would still be one significant and unavoidable impact associated with the movement of the DeVries Home.

i. Aesthetic Resources. The Senior Center alternative would result in similar impacts to the proposed project alternative but the amount of change would be incrementally less than the project. Similar to the proposed project, the visual character of the project site would change with the Senior Center alternative, but it would not be degraded. Implementation of the Senior Center alternative would result in a significant impact related to a new source of light and glare, but this impact could be reduce with implementation of the mitigation measure outlined in Section IV.I, Aesthetic Resources.

D. ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Of the three alternatives analyzed above, the No Project/No Build alternative would avoid most of the impacts that would result from implementation of the proposed project, including impacts related to cultural resources, transportation, and noise. Because the No Project/No Build alternative would not result in construction, no significant and unavoidable impacts would result. However, this alternative would not meet the majority of the project objectives. It would also not realize several of the beneficial impacts associated with the Reduced Build alternative and the Senior Center alternative, including the enhancement of community integrity, the development of an infill mixed-use project, and addition to the City's affordable housing stock. Each of these alternatives would also preserve a portion of the historic resources that would be impacted by the project. The remaining impacts would be very similar to the project impacts, but could be mitigated to a less-than-significant level.

Development of either the Reduced Build or Senior Center alternatives would not result in any increased or additional physical impacts beyond those identified for the proposed project. Therefore, each of these alternatives do have elements that are environmentally superior to the proposed project. However, implementation of either alternative would not fully achieve the identified project objectives.